

**QUINN EMANUEL URQUHART
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Counsel for the Official Committee of

Unsecured Creditors of Lehman

Brothers Holdings Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., et
al.,

Debtors.

Chapter 11

Case No. 08-13555 (SCC)

**NOTICE OF PRESENTATION OF
[PROPOSED] SCHEDULING ORDER
AND DISCOVERY PLAN**

PLEASE TAKE NOTICE that the undersigned request presentment of the annexed [Proposed] Scheduling Order and Discovery Plan (the “Proposed Order”) to the Honorable Shelley C. Chapman, United States Bankruptcy Judge, for signature on **April 14, 2015 at 10:00 a.m.** (prevailing Eastern time).

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the Proposed Order must be in writing, must conform to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the Local Rules of the Bankruptcy Court for the Southern District of New York, must set forth the name of the objecting party, the basis for the objection and the specific grounds therefore, and must be filed with the

Bankruptcy Court, by **April 13, 2015 at 4:00 p.m.** (prevailing Eastern Time) electronically in accordance with General Order M-242 (General Order M-242 and the User's Manual for the Electronic Case Filing System may be found at www.nysb.uscourts.gov, the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court's case filing system, and by all other parties in interest on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-242, and any objection must further be served upon: (i) Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, New York, New York 10010, Attn. Susheel Kirpalani, Esq., James C. Tecce, Esq., and Tyler G. Whitmer; (ii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004, Attn. Andy Velez-Rivera, Esq., Paul Schwartzberg, Esq., Brian Masumoto, Esq., Linda Riffkin, Esq., and Tracy Hope Davis; Esq.; (iii) Wachtell Lipton, Rosen & Katz, 51 West 52nd Street, New York, New York 10019, Attn. Paul Vizcarrondo, Esq., Amy Wolf, Esq. and Ian Boczko, Esq.; (iv) Curtis, Mallet-Prevost, Colt & Mosle LLP, 101 Park Avenue, New York, New York, 10179, Attn. Joseph D. Pizzurro, Esq., L.P. Harrison 3rd, Esq., Michael J. Moscato, Esq. and Nancy Delaney, Esq., and (v) any person or entity with a particularized interest in the Proposed Order, so as to be received no later than **April 13, 2015 at 4:00 p.m.** (prevailing Eastern Time). Unless objections are timely received in accordance with this paragraph, the Proposed Order may be entered without a hearing.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, a hearing will be held at the next omnibus hearing date scheduled in these cases. The

moving and objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: April 3, 2014
New York, New York

**QUINN EMANUEL URQUHART
& SULLIVAN, LLP**

By: /s/ Tyler G. Whitmer

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*Counsel for the Official Committee of Unsecured
Creditors of Lehman Brothers Holdings Inc.*